

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

KATHLEEN HODSON

Plaintiff,

vs.

ALPINE MANOR, INC. d/b/a  
INTEGRATED HEALTH SERVICES  
OF ERIE AT BAYSIDE

defendant.

Civil Action No. 03-0374e

Judge Maurice B. Cohill, Jr.

**OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

AND NOW comes Plaintiff, Kathleen Hodson, pro se, and files the within Opposition To Defendants' Motion For Summary Judgment, and in support thereof avers as follows:

1. Defendant is not entitled to summary judgment because (1) Plaintiff can establish a hostile work environment claim, based on religion, and does have evidence to prove she was discriminated against because of her religion under Title VII; (2) Plaintiff can establish a violation of the Americans' With Disabilities Act, and she has sufficient evidence proving she was discriminated against, and terminated because of her disability; (3) Plaintiff has ample evidence to prove her claim for hostile work environment based on sexual harassment, her disability; and (4) Plaintiff can prove a cause of action for retaliation under Title VII and the ADA, and there is evidence to support a wrongful discharge claim.

2. There exists a genuine issue of material fact in this action as to Plaintiffs' claims and a reasonable jury could conclude that Plaintiff has a valid cause of action, under substantial theory, listed in the Complaint.

3. Therefore, Defendant, is not entitled to a judgment as a matter of law

AND IN CLOSING, Plaintiff, being pro se, stresses the legal policy favoring, my right, to go to trial. A trial is needed to resolve a number of disputed facts: see attached.

WHEREFORE, Plaintiff requests that Defendants' Motion For Summary Judgment, be denied.

Respectfully Submitted,

By Kathleen Hodson  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the OPPOSITION TO SUMMARY JUDGMENT, has been served by United States first class mail, postage pre-paid this 19th day of August, 2005, upon the following counsel of record: *and brief in support!*

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*Kathleen Hodson*  
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